

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. &
Email Address

James A. Dumas (SBN 76284)
Christian T. Kim (SBN 231017)
Ann S. Chang (SBN 281116)
DUMAS & KIM, APC
3435 Wilshire Boulevard, Suite 990
Los Angeles, California 90010
Phone: (213) 368-5000
Fax: (213) 368-5009
jdumas@dumas-law.com
ckim@dumas-law.com
achang@dumas-law.com

FOR COURT USE ONLY

☐ Individual appearing without attorney
☒ Attorney for: Carolyn A. Dye, Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION

In re:
EUNHO KIM,

CASE NO.: 2:19-bk-24335-BB
CHAPTER: 7

NOTICE OF SALE OF ESTATE PROPERTY

Debtor(s).

Sale Date: 06/15/2021

Time: 2:00 pm

Location: 255 E. Temple Street, Courtroom 1368, Los Angeles, CA 90012

☒ Public ☐ Private

Last date to file objections: 06/01/2021

Description of property to be sold:

1370 Kashlan Road, La Habra Heights, California 90631-8416 (APN: 8267-028-024)

Terms and conditions of sale:

The terms and conditions of the sale are set forth in the notice attached hereto as Exhibit "A"

Proposed sale price: \$ 1,770,000.00

Overbid procedure (if any):

The overbid procedure is described in the notice attached hereto as Exhibit "A"

If property is to be sold free and clear of liens or other interests, list date, time and location of hearing:

June 15, 2021

2:00 p.m.

Via Zoom

255 E. Temple Street, Courtroom 1539, Los Angeles, CA 90012

Contact person for potential bidders (include name, address, telephone, fax and/or email address):

James A. Dumas (SBN 76284)

DUMAS & KIM, APC

915 Wilshire Boulevard, Suite 1775

Los Angeles, California 90017

Phone: (213) 368-5000

Fax: (213) 368-5009

jdumas@dumas-law.com

Date: 05/25/2021

James A. Dumas (SBN 76284)
Christian T. Kim (SBN 231017)
Ann S. Chang (SBN 281116)
DUMAS & KIM, APC
3435 Wilshire Boulevard, Suite 990
Los Angeles, California 90010
Phone: 213-368-5000
Fax: 213-368-5009

Attorneys for Chapter 7 Trustee,
Carolyn A. Dye

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re:
EUNHO KIM,
Debtor.

Case No.: 2:19-bk-24335-BB

Chapter 7

[Honorable Sheri Bluebond]

**NOTICE OF TRUSTEE'S MOTION FOR
ORDER AUTHORIZING SALE OF REAL
PROPERTY OF THE ESTATE [1370
Kashlan Road, La Habra Heights,
California 90631-8416] FREE AND
CLEAR OF LIENS AND INTERESTS,
SUBJECT TO HIGHER AND BETTER
OFFERS, AND APPROVING
OVERBIDDING PROCEDURES**

Date: June 15, 2021

Time: 2:00 p.m.

Place: Via Zoom

255 E. Temple Street

Courtroom 1539

Los Angeles, CA 90012

**TO THE HONORABLE SHERI BLUEBOND, UNITED STATES BANKRUPTCY JUDGE,
THE DEBTOR AND HER COUNSEL OF RECORD, AND OTHER INTERESTED
PARTIES:**

**NOTICE OF TRUSTEE'S MOTION FOR ORDER AUTHORIZING SALE OF REAL PROPERTY OF THE ESTATE [1370
Kashlan Road, La Habra Heights, California 90631-8416] FREE AND CLEAR OF LIENS AND INTERESTS, SUBJECT TO
HIGHER AND BETTER OFFERS, AND APPROVING OVERBIDDING PROCEDURES**

1 **PLEASE TAKE NOTICE** that on June 15, 2021, at 2:00 p.m., a hearing will be held via
2 Zoom in Courtroom 1539 before the Honorable Sheri Bluebond, United States Bankruptcy Judge, in
3 the United States Bankruptcy Court located at 255 E. Temple Street, Los Angeles, California to
4 consider the motion of the Chapter 7 Trustee herein, Carolyn A. Dye ("Trustee"), for an order
5 authorizing the sale of the real property located at 1370 Kashlan Road, La Habra Heights, California
6 90631-8416 (APN: 8267-028-024) ("Kashlan Road Property") free and clear of liens and interests,
7 and subject to higher and better offers, approving overbidding procedures. The sales price is
8 \$1,770,000. The Motion is based on the following:

9 Trustee proposes to sell the Property in the best interest of the estate, is an exercise of
10 Trustee's reasonable business judgment and the sales price for the Property is fair and reasonable.
11 The Motion is based upon 11 U.S.C. Section 363 and Rules 2002 and 6004 of the Federal Rules of
12 Bankruptcy Procedure, this Notice of Motion, which is being served upon all interested parties, the
13 Motion, the Declarations of Carolyn A. Dye, Zizi Pak, and James A. Dumas, the Request for Judicial
14 Notice, the records and files of this case, and such oral and documentary evidence as may be
15 presented at or prior to the hearing on the Motion. The Trustee has accepted this offer subject to
16 overbid and bankruptcy court approval.

17 a. Minimum Overbids. The minimum overbid for the Property shall be \$5,000 above the
18 present offer and any subsequent overbids shall be at least \$5,000 over the preceding offer.

19 b. Minimum Deposits. A minimum deposit of Twenty-Five Thousand Dollars
20 (\$25,000). The overbid payment shall be by cashier's check payable to "Carolyn A. Dye ATF Eunho
21 Kim," and must accompany any overbid offer for the Property with evidence of the ability to close
22 the transaction. In the event the approved Buyer does not close the transaction, the deposit will be
23 non-refundable if the overbid is accepted and the sale does not close within fourteen (14) days of the
24 date on which the Order approving the sale of the Property is entered by the Court.

25 c. Overbidders are requested to submit to the Trustee, not later than forty-eight (48)
26 hours before the hearing date, a cashier's check for the required deposit and evidence of the ability to
27 close. The Trustee will promptly advise any proposed overbidder of any disapproval of
28 qualifications, giving the overbidder an opportunity to correct the deficiency. The Trustee holds sole

1 discretion in accepting and rejecting all overbids. In any event, the proponent of each overbid must
2 submit, not later than one hour prior to the date and time of the hearing on the sale, a cashier's check
3 for Twenty-Five Thousand Dollars (\$55,500) and evidence of the financial ability to close escrow
4 within fourteen (14) days of submission of overbid. This evidence must at a minimum include a
5 demonstration of firm financing commitment from a recognized lender and/or sufficient liquid funds
6 on deposit, all to the satisfaction of the Trustee.

7 d. All overbids for the Property must provide for payment of the entire purchase price at
8 the close of escrow.

9 e. Any overbids shall offer to purchase the Property on a "as-is - where is" basis and
10 shall contain no conditions, contingencies or addendum in addition to those contained in the terms
11 agreed to between Trustee and Buyer and presented to this Court.

12 f. All due diligence investigations shall be conducted prior to the sale hearing.

13 g. At the conclusion of the hearing on the Motion, the Court shall determine the highest
14 and best offer for the Property, and the Trustee shall proceed to consummate the sale of the Property
15 in accordance with such offer to the highest bidder without further notice to creditors or hearing
16 before this Court.

17 h. The overbidder's deposit is non-refundable in the event that Court confirms the sale
18 but, for any reason whatsoever, the overbidder fails to close the sale timely. The overbidding party
19 will be bound by all of the terms of sale proposed in this Motion (as incorporated by reference in the
20 sales contract) except as to price, without contingencies of any kind, including financing
21 contingencies, and shall close the escrow no more than fourteen (14) days after the entry of the order
22 approving the Motion.

23 i. The Trustee also proposes that the Court confirm a backup buyer so that, in the event
24 that the successful overbidder does not close within fourteen (14) days after the entry of the order
25 approving the Motion, the Trustee may retain the deposit of the original successful buyer as
26 liquidated damages and sell the Property to the back-up buyer for the amount of such backup last bid.

27 j. The Trustee also seeks a ruling that the party to whom the Court confirms the sale and
28 any backup buyers are good faith purchasers for purposes of 11 U.S.C. §363(m).

1 You may request a complete copy of this Motion from

2 James A. Dumas, Jr.
3 DUMAS & KIM, APC
4 915 Wilshire Blvd., Ste. 1775
5 Los Angeles, CA 90017
6 (213) 368-5000
7 jdumas@dumas-law.com

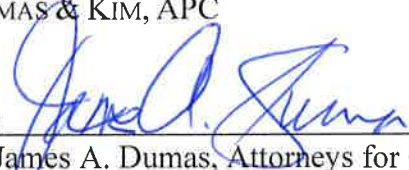
8 A complete copy of the Motion is also on file with the Clerk of the Court and may be viewed
9 at the United States Bankruptcy Court, 255 E. Temple Street, Room 940, Los Angeles, CA 90012.

10 **PLEASE TAKE FURTHER NOTICE** that any objection to the Motion or the proposed sale
11 must be made in writing and filed with the Court no later than fourteen (14) days prior to the hearing
12 in conformity with Local Bankruptcy Rule 9013-1(f), and consist of a written statement of all reasons
13 in opposition, an answering Memorandum of Points and Authorities, declarations, and documentary
14 evidence on which the responding party intends to rely.

15 **PLEASE TAKE FURTHER NOTICE** that pursuant to Local Bankruptcy Rule 9013(h), any
16 objection not timely filed and served may be deemed by the Court to be consent to the relief
17 requested and may result in the Court's issuance of an order without further notice or hearing.

18 Dated: May 25, 2021

DUMAS & KIM, APC

19
20 By: 
21 James A. Dumas, Attorneys for Chapter 7
22 Trustee, Carolyn A. Dye

23 Date of Mailed Service: May 25, 2021
24
25
26
27
28

In re: Eunho Kim

CHAPTER: 7

CASE NUMBER: 2:19-bk-24335-BB

Debtor(s):

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 915 Wilshire Blvd., Ste. 1775, Los Angeles, CA 90017.

A true and correct copy of the foregoing document entitled (specify): Notice of Trustee's Motion for Order Authorizing Sale of Real Property of the Estate [1370 Kashlan Road, La Habra Heights, California 90631-8416] Free and Clear of Liens and Interests, Subject to Higher and Better Offers, and Approving Overbidding Procedures will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) May 25, 2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Ann Chang achang@dumas-law.com
Simon S Chang simonchangesq@gmail.com
Joseph Cruz joe@cruzapc.com
Luke P Daniels zlukedaniels@yahoo.com
James A Dumas jdumas@dumas-law.com, jdumas@ecf.inforuptcy.com
Carolyn A Dye (TR) trustee@cadye.com, cdye@ecf.axosfs.com;atty@cadye.com
Donald E Iwuchuku donaldiwuchuku@gmail.com, r60703@notify.bestcase.com
Christian T Kim ckim@dumas-law.com, ckim@ecf.inforuptcy.com
Elizabeth A Lombard elombard@zwickerpc.com, bknotices@zwickerpc.com
Valerie Smith claims@recoverycorp.com
United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov
Robert P Zahradka caecf@tblaw.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) May 25, 2021, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Connie Kim
1370 Kashlan Rd.,
La Habra Heights, CA 90631

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) May 25, 2021, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

May 25, 2021

Danielle M. Landeros

/s/ Danielle M. Landeros

Date

Printed Name

Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

F 9013-3.1.PROOF.SERVICE

In re: Eunho Kim

CHAPTER: 7

CASE NUMBER: 2:19-bk-24335-BB

Debtor(s).

EunHo Kim
9815 Carmenita Apt. H
Whittier, CA 90605

EunHo Kim
1370 Kashlan Rd.,
La Habra Heights, CA 90631

Countrywide Home Loans, Inc.
MS SV-79 Document Processing
1800 Tapo Canyon
Simi Valley, CA 93063

Countrywide Home Loans, Inc.
4500 Park Granada
Calabasas, CA 91302

Mortgage Electronic Registration Systems, Inc. ("MERS")
P.O. Box 2026
Flint, MI 48501

Countrywide Home Loans, Inc.
MS SV-79 Document Processing
P.O. Box 10423
Van Nuys, CA 91410

CTC Real Estate Services
155 North Lake Ave.
Pasadena, CA 91109

Hanmi Bank
Loan Operations Department
3660 Wilshire Blvd., PH-A
Los Angeles, CA 90010

Wells Fargo Bank, N.A.
C/O Select Portfolio Servicing, Inc.
3217 S. Decker Lake Drive
Salt Lake City, UT 84119

Kye Sik Moon
He should be on the creditor's list already

State of California
Employment Development Department
Lien Group, MIC 92G
P.O. Box 826880
Sacramento, CA 94280

Internal Revenue Service
300 N. Los Angeles St. Mail Stop 5027
Los Angeles, CA 90012

In re: Eunho Kim

CHAPTER: 7

CASE NUMBER: 2:19-bk-24335-BB

Debtor(s).

Jin Ree
401 N. Bixel St.
Los Angeles, CA 90026

Attorney Recovery Systems, Inc.
18757 Burbank Blvd., #300
Tarzana, CA 91356

Hamilton Equity Group, LLC
P.O. Box 280
Buffalo, NY 14201

Hamilton Equity Group, LLC
c/o Sheryl D. Noel
Coleman & Horowitz, LLP
499 W. Shaw Avenue, Suite 116
Fresno, CA 93704

Office of the General Counsel
Wells Fargo & Company
21680 Gateway Center Drive, Suite 280
Diamond Bar, CA 91765

Wells Fargo Bank, N.A.
P.O. Box 6148
El Monte, CA 91734

State Board of Equalization
P.O. Box 942879
Sacramento, CA 94279

State of California
Franchise Tax Board
P.O. Box 2952
Sacramento, CA 95812

California Bank & Trust
c/o Buchalter Nemer
1000 Wilshire Blvd, Suite 1500
Los Angeles, CA 90017

Los Angeles County Tax Collector
225 North Hill St., Room 109
Los Angeles, CA 90012

Los Angeles County Tax Collector
225 North Hill St., Room 122
Los Angeles, CA 90012

☒ Service information continued on attached page

Label Matrix for local noticing
0973-2

Case 2:19-bk-24335-BB
Central District of California
Los Angeles
Tue May 25 12:11:34 PDT 2021

Wells Fargo Bank, N.A., as trustee, on behal
Tiffany and Bosco
1455 Frazee Road
Suite 820
San Diego, CA 92108-4395

American Express National Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

CAPITAL ONE BANK USA
1680 Capital One Drive
McLean, VA 22102-3407

Capital One Bank (USA), N.A.
P.O. Box 41067
Norfolk, VA 23541-1067

Collection at Law, Inc.
3835 E. Thousand Oaks Blvd., #R-349
Thousand Oaks, CA 91362-3637

Dong K. Park
Law Offices of Martin D. Goodman
456 Montgomery St., Suite 1300
San Francisco CA 94104-1246

Hamilton Equity Group, LLC
424 Main Street, Ste 1705
P.O. Box 280
Buffalo, NY 14202-3511

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

LENDING CLUB CORP
595 Market St, Suite 200
San Francisco, CA 94105-2807

American Express National Bank c/o Zwicker &
80 Minuteman Road
P.O. Box 9043
Andover, MA 01810-0943

Los Angeles Division
255 East Temple Street,
Los Angeles, CA 90012-3332

American Express National Bank, AENB
c/o Zwicker and Associates, P.C.
Attorneys/Agents for Creditor
P.O. 9043
Andover, MA 01810-0943

CITICARDS CBNA
388 Greenwich St
New York, NNY 10013-2362

Capital One Bank (USA), N.A.
by American InfoSource as agent
PO Box 71083
Charlotte, NC 28272-1083

DISCOVER FIN SVCS LLC
Discover Financial Services
Carol Stream, IL 60197-6103

Eunho Kim Irrevocable Trust
1370 Kashlan Road
La Habra, CA 90631-8416

Hamilton Equity Group, LLC
c/o Coleman & Horowitz LLP
499 W. Shaw Ave., Ste 116
Fresno, CA 93704-2516

(p)JPMORGAN CHASE BANK N A
BANKRUPTCY MAIL INTAKE TEAM
700 KANSAS LANE FLOOR 01
MONROE LA 71203-4774

SAMS CLUB
2101 SE Simple Savings Dr
Bentonville, AR 72712-4304

DUMAS & KIM, APC.
3435 Wilshire Blvd., Ste. 990
Los Angeles, CA 90010-1998

AMERICAN EXPRESS (AMEX)
200 Vesey Street
New York, NY 10285-3106

BANK OF AMERICA
100 N Tryon St
Charlotte, NC 28202-4024

California Dept. of Tax and Fee Administrati
Collections Support Bureau, MIC: 55
PO Box 942879
Sacramento, CA 94279-0055

Capital One Bank (USA), N.A.
c/o American InfoSource
4515 N. Santa Fe Ave.
Oklahoma City, OK 73118-7901

Discover Bank
Discover Products Inc
PO Box 3025
New Albany, OH 43054-3025

FRANCHISE TAX BOARD
BANKRUPTCY SECTION MS A340
PO BOX 2952
SACRAMENTO CA 95812-2952

Ho Jin Kim
Soon Jin Hong
21215 Cottonwood Lane
Diamond Bar, CA 91789-3332

Kye Sik Moon
13668 Amberview Place
Corona, CA 92880-5527

Seattle Prime Capital
3701 Wilshire Blvd., Ste 315
Los Angeles, CA 90010-2804

Select Portfolio Servicing, Inc.
P.O. Box 65250
Salt Lake City, UT 84165-0250

Selk Group, Inc.
9555 Magnolia Ave., Ste B
Riverside, CA 92503-3605

Synchrony Bank
170 W Election Rd, Suite 125
Draper, UT 84020-6425

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

United States Trustee (LA)
915 Wilshire Blvd, Suite 1850
Los Angeles, CA 90017-3560

WALMART
702 S.W. Eighth St.
Bentonville, AR 72716-6299

Carolyn A Dye (TR)
Law Offices of Carolyn Dye
15030 Ventura Blvd., Suite 527
Sherman Oaks, CA 91403-5470

Donald E Iwuchuku
Law Offices of Donald Iwuchukwu
21550 Oxnard St 3rd Floor
Woodland Hills, CA 91367-7105

Eun Ho Kim
9826 Painter Ave # K
WHITTIER, CA 90605-4528

Mingho Chen
PO Box 1593
Sierra Madre, ca 91025-4593

Simon S Chang
3200 Wilshire Blvd Ste 1201NT
Los Angeles, CA 90010-1320

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

JPMCB CARD (Chase)
270 Park Ave
New York, NY 10172

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Courtesy NEF

(u) Julian M. Holdings, LLC dba Hyde Park

(u) Rodeo Realty

(u) West Shores Realty

End of Label Matrix
Mailable recipients 40
Bypassed recipients 4
Total 44